Petition for Waiver of OFDM UWB Measurement Procedures
ET Docket No. 04-352
DA 04-2793

WiLinx Corporation is writing in support of a waiver of certain FCC measurement procedures and policies for multi-band orthogonal frequency division multiplexing (MB-OFDM) ultra-wideband (UWB). WiLinx Corporation designs and markets a low-cost low-power all CMOS OFDM-UWB solution for the wireless short-range and high data-rate applications such as wireless USB 2.0.

The measurement procedures for pulse based UWB with pulse repetition interval has been developed in the FCC Office of Engineering and Technology. As these procedures are insufficient for the MB-OFDM systems we request a clarification and a waiver for a new test procedure.

Based on multiple simulation and test results from MBOA-SIG and the following studies to investigating potential interference of MB-OFDM, and in particular into C-band systems:

1. IEEE 802.15-04/010r1, 'Multi-band OFDM Physical Layer Proposal Response to no Voters'
2. IEEE 802.15-04/013r0, 'C-band satellite interference measurements at TDK RF test range'
3. IEEE 802.15-04/0326r0 , 'APD plots and their implications for MB-OFDM UWB interference'
4. IEEE 802.15-04/0412r0 , 'In-band Interference Properties of MB-OFDM'
5. MBOA Comment on Alion Study, submitted to the FCC docket 98-153 on April 12, 2004, submitted by Jeffrey Ross from Alereon.

We see no greater interferences than pulsed UWB systems.

Therefore at WiLinx Corporation we believe that this waiver will help us to provide the customers with the optimum performance and lowest cost solution.

Best Regards,

Masoud Djafari
CEO